



Central Waste Complex (CWC)

Jared Mathey, Ecology Compliance Project Manager

Kelly Elsethagen, Ecology Waste Management Project Manager

(including CWC and M-91 milestones for transuranic/mixed low-level waste management)

John Price, Tri-Party Agreement Section Manager

Compliance Inspection and Enforcement

- Annual Compliance Evaluation Inspection (CEI) required for Federal facilities
- Hanford CEI implemented by annually inspecting ~30 Treatment, Storage, Disposal unit groups that typically include multiple hazardous waste management units (HWMUs)
 - For example, 149 Single Shell Tanks and associated equipment and facilities are one unit group
 - Open violations are tracked through USEPA RCRAInfo database; voluntary compliance, informal enforcement, and formal enforcement (orders) are used to ensure Return To Compliance (RTC)
- Also inspect 20% annually of ~60 Central Accumulation Areas that are not included in the permit as HWMUs



Ecology approach to Hanford inspections

- Ecology project manager & staff identify possible issues to include in inspection scope
- For unit groups with multiple HWMUs, we may rotate between different areas, or, we may return to a prior problem area to confirm return to compliance
- We may vary our focus among topical areas (e.g., Training, Inspections)



The Central Waste Complex (CWC) facility



- Approximately 43 buildings and structures
- More than 10,000 individual waste containers
- Outside storage of containers retrieved per M-091 milestone series
- Adjacent outside storage area for PFP waste is not subject to M-091, and is subject to CERCLA (not a HWMU)



Major topics reviewed in 2017 inspection

- Container labeling
 - Major risk labeling
- Condition of containers
- General inspection records
- Closure and post-closure cost estimates
- Waste minimization
- Training
- On-site Treatment
- Operating records
 - Land Disposal Restriction Requirements
 - Container operating records
- Contingency Plan



2017 CWC Inspection

- Non-Compliance #1 – Major Risk Labeling – Ecology reviewed operating records and observed waste codes requiring additional major risk labeling on containers.
 - Resolution - Discussed later.
- Non-Compliance #2 – Containers not in good condition.
 - Resolution - On February 7, 2018 - Ecology received records and photos showing that Container WH-76-630 was repackaged into a container in good condition.
- Non-Compliance #3 – Incomplete Dangerous Waste Training Plans with grouped job positions.
 - Resolution - On June 26, 2018, Ecology received an updated Dangerous Waste Training Plan with all job positions identified.
- Non-Compliance #4 – Failure to provide requested operating records.
 - Resolution - Non-compliance closed at time of report issuance, as records provided on August 16, 2017, before the report was issued.



Photos from 2017 report



DSC01608 – Area where Container 0049231 is being stored



DSC01605 – Container 0049231



Container WH-76-630



Rusty debris at the base of the container



May 2018 Inspection



- Only one non-compliance cited – Major Risk Labeling – Ecology reviewed operating records and observed waste codes requiring additional major risk labeling on three containers.
- Container 202A75013, labeled as hazardous waste was covered in rust and appeared to be scaling in places. The container did not have the proper risk label.
- See next slide for resolution



Major Risk Labeling Resolution

- USDOE/Contractor – Updated procedures to ensure that all containers accepted at Solid Waste Operations Complex facilities be labeled with the appropriate hazard label.
- All containers at Solid Waste Operations Complex facilities with the risks/hazards of corrosive, reactive, or ignitable were labeled. A complete check through all containers was conducted and containers labeled for compliance with this.
- The agreement also included placing major risk (hazard) labels on the 22 containers referenced by previous inspection reports (e.g. 2017 & 2018 reports).
- Reference the USDOE-RL letter 19-ESQ-0054, dated March 21, 2019.
<https://pdw.hanford.gov/document/AR-01096>



Questions?



For More Info:

- Jared.Mathey@ecy.wa.gov
- 509-372-7949
- ecology.wa.gov/Waste-Toxics/Nuclear-waste



Facebook: EcologyWAHanford



Tweet: @ecyHanford

